

EXHIBIT B



Regina Caeli Academy

EMPLOYEE POLICY HANDBOOK

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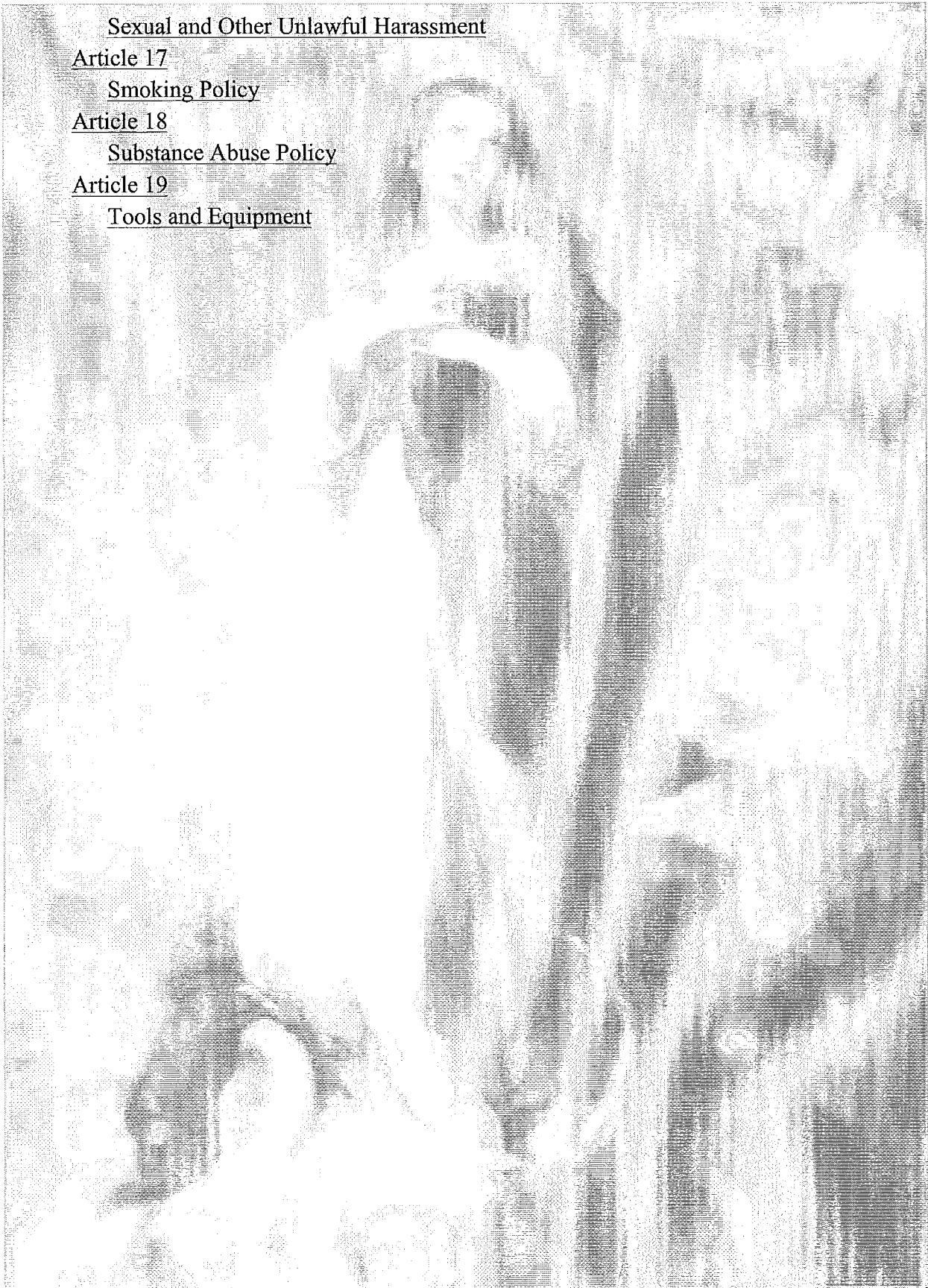
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Introduction

The Academy reserves the right to employ only practicing Catholics or those persons who demonstrate the following: an openness and respect for the Roman Catholic Church and its institutions, a sincere interest in furthering the Academy's mission within the Church, and a cooperative spirit to work under the direction of the administration. It should be further understood that signed acknowledgment of, and compliance with, the policies set forth in this Handbook does not constitute a guarantee of continued employment.

This Handbook has been developed and is provided as a reference for all employees regarding the personnel policies of Regina Caeli Academy (RCA), Incorporated. RCA is an Academy in the Catholic tradition and a 501(c)(3) non-profit corporation. RCA does not discriminate in employment opportunities or practices on the basis of race, color, sex, national origin, or age.

Students learn not only by what is taught, but also by who the tutors are, what they believe, and how they act. In accepting a position in our Academy, you agree to act and speak in a way that supports the Roman Catholic Church and its teachings. Serious actions contrary to the Church's teachings (including, but not limited to, cohabitation outside of marriage, engaging in sex outside of marriage, marrying outside of the Church, use of artificial contraception or sterilization, leaving the Catholic faith, public support of abortion, the use of profanity, flagrant deceit or dishonest or scandalous public behavior) may result in termination of employment.

Disclaimer

This personnel policy Handbook is the property of Regina Caeli Academy. All employees will be issued a copy of the Handbook as required reading when initially hired or when granted any continuation of employment. Current editions of the Handbook will be kept by the local administrative office for employee referral. This Handbook contains the policies and practices in effect at the time of its publication. All previously issued Handbooks are superseded. The administration reserves the right at any time to unilaterally revise, modify, delete, or add to any and all policies, procedures, work rules, or benefits stated in this Handbook or in any other document. No oral statements or representations can in any way change or alter the provisions of this Handbook. Employees will be notified whenever there has been an addendum or revision to any of the policies in the Handbook.

Please read this Handbook carefully. One of your first responsibilities is to become familiar with its contents. This Handbook is only a summary of our policies, however, so please feel free to ask any questions you may have. All information in this Handbook is subject to change at any time at the discretion of RCA with or without notice.

Employment At-Will

This Handbook is presented as a matter of information only and its contents should not be interpreted as an express, implied, or inferred contract of employment between RCA and any of its employees. Your employment with RCA is “at-will” and entered into voluntarily. You are free to resign at any time, for any reason, with or without notice. Similarly, RCA is free to terminate the employment relationship at any time, with or without notice.



I. The Mission of Regina Caeli Academy

Article 1

Mission Statement

Cooperating in the order of grace and subordinating all things to the principle of *Ad Majorem Dei Gloriam* ("to the Greater Glory of God") through the Heart of Jesus, the Mission of Regina Caeli Academy is realized through the intimate and focused medium of a small center environment and highly dedicated faculty and staff to:

- Form classically educated young men and women according to the unbroken tradition and teaching of the Roman Catholic Church, the Ignatian Principles of Education, and the Spiritual Exercises of Saint Ignatius with the purpose that each student will:
 - Achieve salvation
 - Deepen in intellect and character
 - Grow spiritually
 - Develop the ability to win others for Christ
 - Perceive and elect his or her God-given vocation

This will be accomplished by developing the whole person in all of his or her capacities through:

- Special emphasis on excellent standards
- Discipline
- Memory work
- Oral presentation
- Reception of the Sacraments
- Daily application of the Golden Rule
- Exercise of the virtues of hospitality, service, graciousness, courtesy, and good manners

Article 2

Prayer Life

The center day begins with prayer. The center additionally gathers at noon for the *Angelus* (in the Easter Season, the *Regina Caeli*) and mid-day prayers. Each class begins and ends with prayer. The entire center assembly ends each day with a prayer. The sacrament of Penance is provided frequently.

II. Tutor Job Expectations

In keeping with the mission of Regina Caeli Academy, the tutor's primary responsibility is to provide a Catholic educational environment in which the students are challenged to reach their God-given potential. To achieve this goal, tutors should:

1. Support and exemplify in conduct, expression, etc., Catholic doctrine and morality in a manner consistent with the teachings of the Catholic Church and shall not teach, advocate, encourage, or counsel beliefs or doctrines contrary to those teachings. They should promote and teach in a positive light all the truths and disciplines of the Faith.
2. Relate with the administration, other tutors, staff, students, and parents in a way that fosters mutual respect. Tutors must deal justly and impartially with students regardless of their physical, mental, emotional, economic, social, racial, or religious characteristics. They should also establish friendly and cooperative relationships with the other members of the staff. Familiarity with the mission and principles of Regina Caeli Academy is needed so as to be able to put these into effect. It is also essential to fostering a good professional relationship with the parents of their students.
3. Devise and implement a rule for orderly participation in the classroom. Each tutor is responsible to initiate and utilize a preventive discipline plan in his/her classroom according to the needs of the students. Nagging, threatening, bargaining, and corporal punishment are unacceptable methods for resolving or preventing breach of order with students at Regina Caeli Academy.
4. Maintain neat, orderly, and organized classrooms. It is the responsibility of the tutor to oversee the general neatness of the classroom. However, he/she must impress upon each student the duty to perform specific chores, e.g., emptying trash, cleaning the blackboard and erasers, keeping the shelves and storage areas in order, etc. It is also the responsibility of the tutor to report to the office any damages or items that need repair in his/her classroom.
5. Participate actively in all regularly scheduled meetings. Attendance is also obligatory for short, unscheduled meetings called by the administration whenever necessary.
6. **Attend parent meetings scheduled for their students at any time during the center year. The tutor is responsible for attending the meeting and for giving an accurate assessment of the student's academic abilities and progress at Regina Caeli Academy.**

7. Provide for appropriate and accurate student evaluation. Assignments should be clear; age and content appropriate, and have an adequate means of evaluation. **Corrected tests and papers submitted by students should be returned within two (2) weeks.**
8. Maintain and record pertinent data for all official center documents and progress reports. It is the tutor's responsibility to carefully record test results, absentees, anecdotal information, grades, and any other center related information on the permanent record folder and/or on any forms being released to authorized personnel, center agencies, or parents. The tutor must respect the right of each student to have confidential information withheld except when authorized or required by law.
9. Notify parents and the administrator promptly of any incidents and/or potential problems requiring special attention. The tutor must provide parents with information that will serve the best interests of their children, and be discreet with information received from parents. A tutor should have adequate insight into the causes and indications of behavioral problems.
10. Assume designated responsibilities within the center concerning maintenance, supervision of children, and proper usage of educational materials and equipment. When supervising the children, especially during recess periods, the tutor must be diligent, as the tutor may be liable/accountable in the event of an accident or injury.
11. Check email daily during syllabus weeks and answer no more than 24 hours after receipt, excluding holidays and Saturdays; email should be checked Sunday night before center on Monday.
12. Arrive at work each workday ready to begin work. Hours are defined within the Employee's yearly contract. It is the Employee's responsibility to notify RCA administration if Employee will be absent due to sickness no later than 7:30 AM so that a substitute may be obtained.
13. Remove all items in Staff folders at the end of each workday.

III. Employment Policies

Article 1

Organizational Structure of Regina Caeli Academy

RCA's organization exists to promote the mission of the academy through a streamlined hierarchy headed by the Board of Directors. The Executive Director reports directly to the Board. Reporting to her are the Director of Education, the Director of Operations, and the Corporate Office Manager.

The **Center Coordinators of Education** are responsible for the Faculty and Staff of each Center and report directly to the Director of Education.

The **Center Coordinators of Operations** report directly to the Director of Operations.

RCA's honed and well-defined policies, procedures, staffing, and overall operations model ensure the stability necessary to effectively manage its growth. RCA's individual Centers operate on a 3-tier Center start-up and maturation model:

• Aspirant Center Characteristics

- Typically the first 1- 2 years of operations
- Emphasis on spiritual formation of parents, staff, and students
- Learning and honing the classical education model
- Developing family and Center fundraising
- Corporate staff allocating more support time
- Financial support as needed

• Novice Center Characteristics

- Typically years 2-4 of operations
- Expanded extracurricular activities (e.g., theatrical plays, robotics, etc.)
- Additional training
- Fully staffed
- Full enrollment
- Financial and family stability

• Professed Center Characteristics

- Designation upon review
- Opportunity for secondary metropolitan location
- Eligibility for permanent location

While there is an inherent degree of flexibility in these designations, the Corporate Office will use these as guidelines to aid in the effective management and success of our new Centers.

Duties and Responsibilities

Job responsibilities may change at any time during employment. From time to time, a tutor may be asked to work on special projects or to assist with other work necessary or important to the operation of the Academy. Cooperation and assistance in performing such additional work is expected.

Article 2

Employment Categories

It is the intent of the Academy to clarify the definitions of employment classifications so that the employees understand their employment status and benefit eligibility.

Full-Time Administration:

These positions of Director (Executive, Operations, and Education), Office Manager and all full-time employees may require year-round work and have no set hours. All Administration is expected to participate in all extra-curricular events. Email should be checked daily Monday-Friday and be responded to no more than 24 business hours after receipt, except during holidays and weekends. Email must be checked the night prior to a center day.

Center Administration:

The positions of Center Coordinator (Education and Operations) work from Center Coordinator training until the end of May. There will also be two dates in the summer when the Coordinators will be required to conduct interviews and assessments for potential families. These dates will be set by the corporate office before the end of May. All administration is expected to participate in extra-curricular events, including graduation. Email should be checked daily Monday-Friday and be responded to no more than 24 business hours after receipt, except during holidays and weekends. Email must be checked the night prior to a center day.

Lead Tutors:

Lead Tutors are required to lesson plan as needed per grade, keep accurate grades of their students, turn in grades based on time line given by the administration, and may be asked to participate or lead extra-curricular activities. They are required to stay with their assigned students all day according to the hours defined in the Employee's contract. They may be asked to attend unplanned staff meetings and are expected to be at all academy open houses. All 7th-12th grade tutors are required to attend graduation. All staff is required to meet the staff dress

code each academy day.

Lead tutors complete 8 additional hours of training throughout the academic year via conference calls and/or staff meetings.

Assistant Tutors or Child Care Para-Professionals:

These positions are required to be at their assigned location according to the Employee's contract and the local administration's direction. They must be flexible, as these are positions that could change based on substitution needs. Staff members may be asked to do extra-curricular activities and to attend staff meetings. All staff is required to meet the staff dress code each RCA day.

Article 3

Non-center Employment

After-center employment of all staff members must not interfere with center duties and/or faculty meetings, in-service programs, or other required activities. Employees may not conduct personal or non-RCA business during RCA work hours. Use of cell phones are not permitted during the hours determined by the employee's contract and which are considered RCA days. Please give the office number to family members to use in case of an emergency.

Article 4

Personnel File

Individual personnel files are kept in the Administrator's office. The records include copies of application forms, transcripts, health records, certification information, yearly contracts and any other documents pertinent to the staff member. The personnel files are kept confidential and are only available to the administrator, tutor (upon request), and lawful civic and center authorities. Tutors should notify the administrator whenever any of the data tracked in the files changes.

Article 5

Termination of Employment

Employment of tutors can be terminated by the administration during the academic year at the discretion of RCA. If an employee wishes to voluntarily terminate his or her employment, RCA requests that it be provided a two (2) week notice of the proposed separation.

All center manuals, books, employee Handbooks, faculty Handbooks, keys, etc., in an employee's possession at the time of termination must be returned before a final paycheck will be released.



IV. Payroll and Benefit Plan Summary

Article 1

Sick Pay

Both salaried and non-salaried employees are eligible for two (2) sick days per semester. Sick leave is measured by the semester and does not carry over to the next semester. Employees must notify designated RCA Administration by 7:30 AM if he or she will be absent due to illness, either of the employ him/herself or of his/her children attending RCA if applicable. Any additional days off due to sickness may be permitted at the discretion of RCA, but will be on an unpaid basis. An eligible employee whose employment is terminated during a contracted period will not be paid unused sick leave.

Article 2

Absence and Tardiness

RCA does not provide personal days off. If an employee is absent from work or work days (open houses and tutor work days) and such absence is not due to illness, a \$75.00 fee will be deducted from the employee's next paycheck or, in the instance of a work-tuition staff member, the fee will be added to their monthly tuition. Employees should make every attempt to schedule all doctor/dentist appointments during non-work hours (including free periods for tutors), so as to minimize the impact on other staff and the Academy. For appointments that must fall during working hours, employees should provide administration or management as much advance notice as possible and receive approval prior to the leave.

An employee is subject to disciplinary action for tardiness or leaving work early. Hourly employees are paid only for time worked and will not be paid for time when the employee is not present. Salaried and work-tuition employees who are tardy or leave work early will be assessed a \$50 fee per incident that will be deducted from their pay (for salaried employees) or added to their monthly tuition rate (work-tuition employees).

Article 3

Jury Duty

Any employee summoned to serve as a juror or subpoenaed as a witness must notify administration of such summons or subpoena and, to the extent possible, keep in touch with administration during the time the employee is serving as a juror or subpoenaed witness.

Article 4

Leaves of Absence/Permitted Absences

The Academy may grant a leave of absence or permit absences for limited periods of time for specific reasons. Time off is given without pay. Requests for leaves of absence should be discussed with administration or management.

The Academy may grant unpaid leaves of absence or permitted absences under the following conditions:

- Funeral Leave
- Medical Leave/Disability
- Family Leave/Maternity Leave

A leave of absence constitutes an additional expense to the center and is carefully controlled. Please check with administration or management well in advance of any anticipated leave.

Funeral Leave

If any salaried employee needs to take time off due to the death of an immediate family member, the employee should notify administration or management immediately.

Medical Leave/Disability

The Academy, at its discretion, may provide medical leave of absence without pay to eligible employees who are temporarily unable to work due to a serious health condition or disability. All employees are eligible to request medical leave as described in this policy. Employees should make requests for medical leave to administration or management at least 30 days in advance of foreseeable events.

A health care provider's statement must be submitted verifying the need for medical leave and its beginning and expected ending dates. Any changes in this information should be promptly reported to administration or management. Employees returning from medical leave must submit a health care provider's verification of their fitness to return to work.

Family Leave/Maternity Leave

The Academy, at its discretion, may provide family leave of absence without pay to eligible employees who wish to take time off from work to fulfill family obligations relating directly to childbirth, adoption, or placement of a foster child; or to care for a child, spouse, or parent with a serious health condition. A serious health condition means an illness, injury impairment, or physical or mental condition that involves inpatient care in a hospital, hospice, or residential

medical care facility, or continuing treatment by a healthcare provider. All employees are eligible to request family/maternity leave as described in this policy.

Employees should make requests for family leave to administration or management at least 30 days in advance of foreseeable events, and as soon as possible for unforeseeable events.

Employees requesting family leave related to the serious health condition of a child, spouse, or parent may be required to submit a health care provider's statement verifying the need for a family leave to provide care, its beginning and expected ending dates, and the estimated time required.

Eligible employees may request up to a maximum of 12 weeks of family leave within any 12 month period. Any combination of family leave and medical leave may not exceed this maximum limit. If the initial period of approved absence proves insufficient, consideration will be given to a request for an extension. Married employee couples may be restricted to a combined total of 12 weeks leave within any 12-month period for childbirth, adoption, or placement of a foster child; or to care for a parent with a serious health condition.

So that an employee's return to work can be properly scheduled, an employee on family leave is requested to provide the center with at least two weeks advance notice of the date the employee intends to return to work. The Academy is under no obligation to reinstate an employee returning from leave. However, when a medical leave ends, the Academy may at its discretion attempt to reinstate the employee to the same position, if it is available, or to an equivalent position for which the employee is qualified, if possible. If an employee fails to report to work promptly at the end of the family leave, the center will assume that the employee has resigned.

Procedures for applying for family leave are as follows:

1. An employee who becomes pregnant will notify administration or management in writing no later than four months before the anticipated birth of the child whether she wishes to:
 - apply for family leave
 - continue working without taking parental leave
 - resign employment
2. In the event of adoption, the employee will notify administration or management in writing as soon as feasible before adoption whether he or she wishes to:
 - apply for family leave
 - continue working without taking parental leave
 - resign employment

Personal or Professional Leave

The Academy, at its discretion, may provide personal leave without pay to eligible employees who wish to take time off from work duties to fulfill personal obligations.

All employees are eligible to request personal/professional leave as described in this policy. Employees should make requests for leave to administration or management at least 30 days in advance of foreseeable events, and as soon as possible for unforeseeable events.

Eligible employees may request up to a maximum of 12 weeks of personal/professional leave within any 12-month period. If the initial period of approved absence proves insufficient, consideration will be given to a request for an extension.

Health insurance benefits (if any), vacation, and holiday benefits are waived for the full period of the approved leave.

So that an employee's return to work can be properly scheduled, an employee on family leave is requested to provide the center with at least two (2) weeks advance notice of the date the employee intends to return to work. The Academy is under no obligation to reinstate an employee returning from leave. However, when a personal/professional leave ends, the Academy may at its discretion attempt to reinstate the employee to the same position, if it is available, or to an equivalent position for which the employee is qualified, if possible. If an employee fails to report to work promptly at the end of the family leave, the center will assume that the employee has resigned.

An employee's use of a personal leave should take into consideration anticipated work load requirements and staffing needs during the proposed period of leave.

For hourly employees there are no leave benefits at this time, but the Academy reserves the right to make changes from time to time at its sole discretion.

Excused Absences

Absences may be granted from time to time with the advanced approval of the administration or management. In no case will an absence be approved if not granted in advance of the actual absence, with the exception of a death in the employee's immediate family or an unforeseeable emergency.

Article 5

Pay Periods

All salaried and hourly employees will be paid twice a month, on the 15th and the last day of the month. If a payday falls on a weekend or holiday, the pay check will be issued the last weekday prior to this holiday or weekend.

Article 6

Payroll Deductions

As required by law, the Academy must make certain deductions from an employee's paycheck for such items a federal income tax, state income tax, social security, and in some locations, state disability insurance.

At times, there may be other deductions that an employee may authorize. All deductions will be indicated on the employee's paycheck stub. In order to make sure that an employee's deductions are correctly made and updated, an employee must be certain to advise administration of any change relating to deductions or withholding status.

Any questions that an employee may have about a paycheck or deductions made should be addressed to administration or management as soon as possible, preferably in writing.

Article 7

Reimbursement of Expenses

When conditions require that an employee work at a distance from the office location and remain overnight, the Academy will reimburse reasonable lodging cost. If reservations and payment is not arranged by the Academy, a receipt must be turned in by the employee for reimbursement along with a completed reimbursement form. No charges on the lodging receipt will be reimbursed except the actual lodging plus applicable taxes and reasonable phone charges.

Employees who must use a personal credit card for expenses such as lunches, dinners, travel, etc. must turn a copy of the receipt along with a completed reimbursement form.

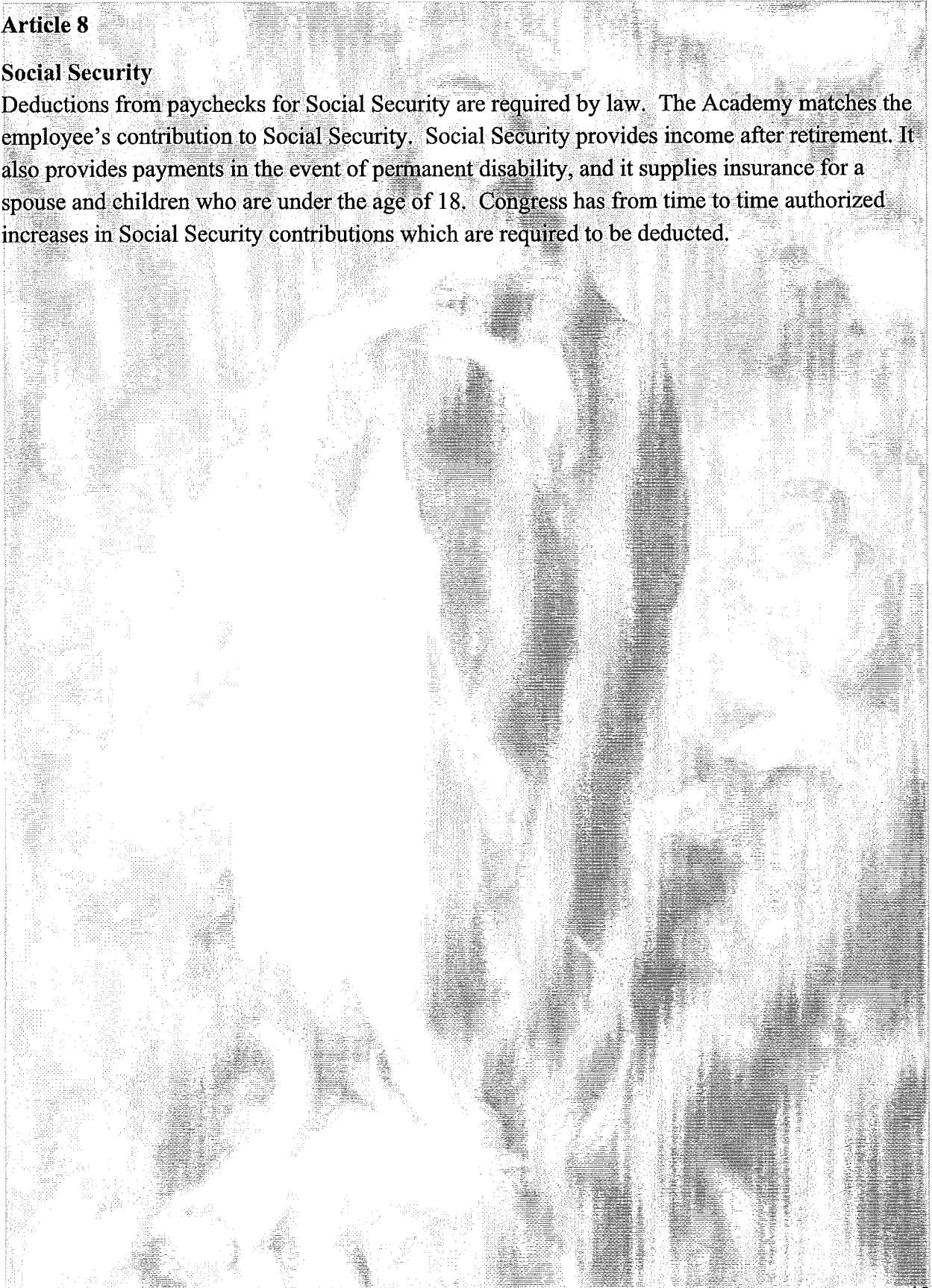
With each receipt and reimbursement form, the Academy must have the pertinent information: name of event attended; name of center or center's guest entertained; names of other employees in attendance; business discussed, etc.

All reimbursable miscellaneous expenses incurred by an employee must have prior authorization by the administration or management, and must be accompanied by a receipt and a completed reimbursement form to receive reimbursement.

Article 8

Social Security

Deductions from paychecks for Social Security are required by law. The Academy matches the employee's contribution to Social Security. Social Security provides income after retirement. It also provides payments in the event of permanent disability, and it supplies insurance for a spouse and children who are under the age of 18. Congress has from time to time authorized increases in Social Security contributions which are required to be deducted.



V. Faculty Development and Supervision

It is the policy of Regina Caeli Academy to strive to attain ever greater spiritual fidelity, moral deportment, and academic success with its student body. Toward that end, all employees are required to participate in ongoing professional evaluation and mentoring/development at Regina Caeli Academy. The administrator is responsible for the development, supervision, and evaluation of employees.

Staff development at Regina Caeli Academy is centered on five areas:

1. Setting Goals and Objectives
2. Meetings, In-services, and Professional Growth
3. Classroom Observations (formal and informal)
4. A Yearly Summative Evaluation
5. Spiritual Formation

Article 1

Classroom Observations

The purpose of an observation is to assist the tutor to improve classroom instruction and performance. In the course of the center year, classroom visitations (formal and informal, announced and unannounced) will be made by the administration. For formal observations, the administrator will usually notify the tutor in advance and discuss the type of observation tool to be used, and also any specific elements of classroom instruction or management that may provide a focus for the visit. A post-observation conference will usually be held and a written summary of the observation provided for the tutor's own records and personnel file. Tutors are encouraged to initiate conferences with the administrator and other faculty members in order to find ways to improve and perfect classroom instruction and performance. Other educators visiting a class can become "another set of eyes" and thus help the tutor to discover new ways to grow and improve.

Special Classrooms: Nursery and PreK 2 and 3

Nursery and PreK2 and 3 staff are ready to receive their charges at 8:15am.

Nursery and PreK2 and 3 staff do not bring the students in their care to RCA events (including the Thanksgiving program, Advent program, daily Mass, or special speakers).

Article 2

Formal Summative Evaluation

1. Annually, or more frequently as necessary or desirable, the administrator will meet with

the tutor to conduct a formal summative evaluation. This overall evaluation of tutoring performance is based on formal and informal observations by the administration, as well as formal and informal conferences during the year, and observed interactions of the tutor with the staff, parents, students, and administration.

The administrator will discuss this evaluation with the tutor. Both the administrator and tutor will sign the evaluation. The tutor's signature only indicates that the tutor has read the evaluation and has had the opportunity to discuss it with the administrator. It signifies neither agreement nor disagreement with the evaluation. The tutor has the right to respond to this evaluation and any response will be filed in the tutor's personnel file.

VI. General Procedures and Policies

Article 1

Change of Information

Upon commencement of employment, and from time to time thereafter, an employee will be asked by administration to complete various forms relating to employment and benefits. These forms will become part of the employee's personnel records maintained by the center.

It is important that these personnel records are accurate and up to date so that each employee can continue to receive uninterrupted benefits. The information is also necessary to determine the amount of deduction for federal and state income tax and to maintain emergency contact telephone numbers.

Article 2

Conduct and Behavior

All employees are expected to perform their duties diligently and to conduct themselves in a professional and courteous manner at all times. Failure to observe the expected standards of performance and behavior may result in a letter of instruction to be placed in the employee's personnel file, disciplinary action, or termination of employment.

Reasons for disciplinary action or termination of employment are subject, but not limited to, the following, and rest solely on the discretion and interpretation of administration:

1. Possession of firearms or other weapons on center or work premises.
2. Violation of the center's substance abuse policy.
3. Failure to comply with safety regulations.
4. Fighting, making threats or engaging in disorderly conducts on center grounds.
5. Stealing or unauthorized use of center's equipment or property or stealing from a cash supply.
6. Inappropriate use of center time, equipment, or supplies for personal use. This would include excessive visiting with co-workers during center hours, inordinate use of the phone to make personal calls, and use of the copy machines for private business without permission.
7. Insubordination, including failure to comply with a supervisor's instructions and work assignments.
8. Dishonesty, including falsification of employment applications, timesheet, or other center documents.
9. Gambling on center premises.
10. Unexcused absenteeism or tardiness.
11. Laziness or sleeping on the job.

12. Commission of a crime or other conduct, which damages the image or reputation of the center.
13. Any action or conversation that is contrary to the doctrine of the Catholic Church and/or the principles of Christian ethics.
14. Violation of center policies or procedures, or any action or omission that compromises or serves to discredit the mission of Regina Caeli Academy.
15. Violation of the staff dress code, including improper shoes.

Disciplinary System

The Administration is responsible for assessing the conduct and behavior of an employee. Immediate termination of employment may be considered appropriate even if no preliminary steps of correction have been taken. Any corrective action taken to encourage and maintain acceptable conduct will be determined in view of the facts and circumstances of each individual case and what is in the best interest of the center and its mission. In this regard, each incident will be considered in light of various factors, including, but not limited to, the seriousness of the incident and the employee's past conduct and performance.

Employee Evaluations

The center staff will be evaluated yearly by the administration prior to consideration of renewal of contracts.

Article 3

Confidentiality

Confidentiality is at the heart of all professional and personal relationships at Regina Caeli Academy: confidentiality between employer and employee, between tutor and student/parent, and between department staff and parents/students of the day or home center.

Confidentiality is the basis of all trust and honor among professionals. It is of the utmost importance for administration, management, faculty, and staff to understand its significance and to accept responsibility to respect and safeguard it. Confidentiality takes on special significance in the small center setting and workplace because of the intimacy of the environment and the potential for harm to an individual's reputation or to the Academy's good name when confidence is compromised or betrayed.

The final decision about the appropriateness of confidentiality regarding a particular matter is the province of the Board of Directors. An employee must bring to the attention of administration or management any matter involving a potential threat to the well-being of the center, students, faculty or staff of Regina Caeli Academy, to which he/she has been "confidant". For example, a tutor, privy to conversation with a parent regarding concern or dissatisfaction about the center or administration, has a responsibility to inform the parent that he/she will report the concern to the

administration for review and resolution. It is preferred that the parent be encouraged to address a concern directly with the administration if it is not resolved by speaking to the tutor. In all situations of a serious nature, though, it is the employee's duty to inform parents of his/her responsibility and obligation to report this information to the administration. The responsibility as an employee to represent the Academy and implement the mission and purpose of the center and to care for the well-being of the entire center population supersedes the responsibility of confidentiality to an individual student or family, or even a group of families.

Confidentiality between Employer and Employee

It is understood by the administration and management that any personnel, payroll, or personal matter between the Academy and an employee is considered confidential and is not discussed with anyone outside of the Board of Directors and/or directly with the employee.

It is expected that the employee will honor the confidentiality of personnel, payroll, and personal matters related to work and not discuss such issues with anyone outside of the Board of Directors, administration, or management with the exception of the employee's immediate family.

The area of confidentiality between employer and employee includes classification of employment, status of probationary period, salary negotiations and schedules, evaluations of job performance, content of personnel files, etc.

A student/parent asking to speak in confidence to a tutor must be told the strict restrictions that the law places on a tutor with regard to child abuse and the necessity of reporting even suspected abuse. Severe penalties result for any failure to comply with the child abuse laws.

Confidentiality between tutor and student/parent extends to center behaviors, discipline, grade records, contents of cumulative folders, tuition, parent hours, etc. However, it should be clearly stated and understood that knowledge of these matters is open to the review and consideration of the administration and the Board of Directors.

While professional discussions may take place between faculty members about center/student/parent issues for the purposes of affecting the harmony of center life, they should always be motivated by charity and mindful of protecting the confidentiality of the student or parent.

Confidentiality of RCA Proprietary Information and Trade Secrets

RCA insists on the undivided loyalty of all employees, including management and non-management staff. Employees must not engage in any conduct that would create an actual or potential conflict of interest or create the appearance of such a conflict. The protection of confidential, sensitive, and proprietary information is of critical importance to RCA. It is

therefore essential that all employees take steps to safeguard such information. Employees must maintain the confidentiality of RCA materials including, but not limited to, RCA corporate documents and policies, curriculum materials for all programs, and guidelines on methods of execution of these curriculum. Employees must not use any confidential, sensitive, or proprietary information of RCA in any manner that is unauthorized or detrimental to the best interests of the company.

Should an occasion arise in which you are unsure of your obligations under this policy, it is your responsibility to consult with your supervisor. Failure to comply with this policy could result in disciplinary action, up to and including termination of employment and/or legal action for breach of this provision.

Article 4

Dress Code

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image of the center. We are role models for the students and, therefore, are required to present ourselves in the manner we expect the students to maintain. As a general rule, all employees are expected to wear properly laundered and pressed clothing and have a neat appearance. "Dress" rather than "casual" style and material is always appropriate attire.

Each staff member working in grades Pre-K4 through twelfth grade agrees to wear the RCA staff uniform consisting of:

- For Women: the white oxford shirt with the RCA logo from Uniform Source, a black skirt that falls below the knee and black dress shoes, which shall be closed at the toe and heel.
- For Men: black dress slacks, with a black belt and black dress shoes, which shall be closed toe and heel, and a plain navy blue tie.
- All staff may wear the Regina Caeli Academy black sweater or any other plain sweater or jacket of any color. This outer wear may not have any reference to media or contain a large logo.

For staff members working in preschool and nursery:

- Black dress pants or skirts and the RCA uniform shirt.
- Nursery workers may wear a scrub shirt, approved by administration, without media characters or large logos.

All Personnel

Administration reserves the right to suspend any employee without pay for distasteful dress. The Board of Directors shall determine duration of suspension.

Article 5

Emergency Closings

At times, emergencies such as severe weather, power failures, equipment failure, etc., can disrupt center operations. In extreme cases, these circumstances may require the closing of the center.

When operations are officially closed due to emergency conditions, the time off from scheduled work will be unpaid to hourly employees. The wages of salaried employees are not affected by center closures.

Article 6

Fraternization Policy

Regina Caeli Academy maintains a policy that prohibits undue fraternization between employees and students. Non-permissible fraternization is defined as any behavior (verbal or physical) of a sexual, illegal, or age inappropriate nature, i.e., as deemed inappropriate for a particular child by the administration of Regina Caeli Academy. This policy pertains not only to engaging in such behaviors, but also to the suggestion, threat, or invitation toward such behaviors.

The relationship between employee and student must always be one of adult to child governed by the moral standards of the Church, the legal standards of the local state government and common sense. As such, this policy prohibits fraternization not only during center hours and on center grounds, but at any time or place. Normally, employees relate with children within the center setting. Prior consultation with the administration should take place if employee is with a student outside the center setting.

Article 7

Good Housekeeping

The Academy recognizes the importance of making work surroundings as comfortable, convenient, and pleasant as possible. To this end, constant efforts are made to provide adequate workspace and equipment, and to keep work areas clean and safe. Good housekeeping improves the appearance of the facilities and provides a safe environment preventing fires, accidents, or personal injuries.

Housekeeping is not one employee's sole responsibility. It is to be shared by everyone as a team effort. An employee is responsible for maintaining his/her work area in a clean and neat condition. All work areas should be tidied at the end of each workday. Each employee is responsible to clean up after him/herself, including washing any dishes or utensils use during meals or breaks. Eating should be restricted to the outdoor seating areas or classrooms as needed. Food, dishes, snacks, etc. should not be left on desks or work tables, especially at the end of the workday.

Article 8

Grievances

All employees are encouraged to communicate to supervisory staff, management, or administration any grievance regarding personnel matters, center or work policies, or procedures. A grievance may be any concern or dispute that an employee merits as needing consideration of management, administration, or the Board of Trustees.

The proper channel of communication of grievances would begin with the employee's immediate supervisor. If the matter is not resolved to employee's or supervisor's satisfaction, it would be brought to the attention of the manager or the administrator depending on the employee's work assignment. If the matter is not resolved on this level, the employee, manager, or administrator may request that it be brought to consideration of the Board of Directors for resolution. The Boards' decision is final in settlement of grievances.

Article 9

Guidelines for Ministering to Youth

The following are general principles to employ when working with children:

1. Whenever possible, avoid accompanying children into restrooms. If you must go with them, try to have another adult present.
2. Avoid driving alone with a child on a regular basis or any distance from child's home. (Note: An obvious exception to the rule of not being alone with children is where there is a relationship in addition to that of minister to youth, i.e. a niece, nephew, etc.)
3. Though the occasion to speak with a student in private may sometimes occur as situations and prudence dictate, employees must practice utmost vigilance to never be alone in a room with a student, particularly when discussing matters of discipline. Whenever possible, employees are to conduct private conversations with the door open and with other staff present. Male staff should seek the presence of female tutors or the administration when initiating or engaging in prolonged conversation with students.
4. Never visit a child's home without at least one adult there.
5. Never invite a child into your home without another adult present.
6. Never discipline using physical force or demeaning language. Physical force should only

- be used to protect yourself, another innocent party, or the child who is out of control.
7. Be careful of physical displays of emotion, i.e. hugging of children. Keep in mind the age of the child, the situation, the setting, and your relationship with that child. A hug could have different connotations to an elementary student than a junior high student of the opposite sex.
 8. Never go on overnight trips with children without at least two adults, permission slips from the parents and the approval of the administration.
 9. Be very careful about the types of jokes, humorous stories, or potentially suggestive situations you share with children. While children may hear jokes and off-color stories from their friends, it has a different impact if it is coming from a role model such as a tutor.
 10. Effective ministry requires that you do not seek to become a student's "buddy". As an adult, it is not appropriate to build a social life around/with youth.
 11. If something strange, embarrassing, or possibly compromising happens to you in your ministry, report it to your supervisor immediately. Administrators can best help you if they can begin investigative or remedial action before a child reports something to his/her parents.
 12. Do not attempt counseling unless you are trained as a counselor. If you do, know your limitations. Avoid counseling in any setting that might suggest dating or other social interaction.

Article 12

Phone Usage

At NO time may cell phones be used during academy hours.

Personal local phone calls may be made from the center's office phone. The calls made and received while at work should be kept to a minimum. Tutors will not be called from class except in the case of an emergency. Personal long distance phone usage on center billing charges is strictly prohibited, unless approved by administration or management. For center personnel, the Center coordinator's RCA-issued phone is available for use.

To assure effective telephone communications, employees should always use an appropriate greeting and speak in a courteous and professional manner. An appropriate greeting would be, "Good morning, Regina Caeli Academy. This is _____. How may I help you?"

Article 13

Punctuality and Work Schedule

Employees are expected to be at work on time every day.

All tutors are expected to attend scheduled staff meetings, conferences, in-service retreats, and

evening or other special events.

Article 14

Safety

The Academy makes every effort to provide working conditions of the highest standard in order to provide an employee with maximum safety and comfort. However, it is each employee's responsibility to promote safety and prevent accidents from occurring by being safety conscious.

An employee should report immediately to administration or management the existence of any unsafe or hazardous condition. In the case of an accident involving personal injury, or damage to the property, however slight, an employee should notify administration or management immediately. Failure to report an accident can result in a violation of legal requirements, and delays can lead to difficulties in processing insurance and benefit claims.

The use of portable heaters, burners, candles, and corrosive toxic materials are only permitted with approval of the administration.

Proper attention to necessity and cost should be employed when utilizing lighting, H/AC, and other equipment necessary for occupancy.

Supervision is required of all activities at the Academy. This includes all student activities in the classroom, hall, and playground and all extra-curricular events, student or adult. There must be a designated person in charge who is a responsible adult. The person in charge of the activity must remain with the group during the building use and is in charge in case of an emergency.

Article 15

Security

It is the responsibility of every employee to ensure that proper external security measures are taken, e.g., keeping exterior doors and windows shut and locked after center or business hours or ensuring that a center vehicle is locked with the windows rolled when not in use.

It is further the responsibility of every employee to maintain the security of all Academy information, documents, and materials compromising the confidential proprietary or private information of the Academy. This should be done in accordance with the policies and procedures described in the various center policies regarding the issue of confidentiality.

All of the materials designed by Regina Caeli Academy are copyrighted. These include those

used in the day center, the home center, and center Start. Any information concerning the development and operation of these programs, as well as any and all client lists, are confidential materials/information belonging to Regina Caeli Academy and may not be shared beyond the professional and legal scope of the Academy.

Every regular full-time employee will be issued the necessary key(s) to access appropriate areas of the Academy. In the event an employee loses a key(s), the employee will report the loss immediately to administration or management. If the loss of a key breaches the center's security to the extent that locks have to be replaced, any expense involved may be borne by the employee, depending on the circumstances and any pattern of carelessness on the part of the employee. Making duplicate keys without approval of administration or management can be grounds for dismissal.

Keys are for use only by the staff member to whom they were originally issued. Staff members may be liable for any consequential injuries, damages, or theft resulting from misuse of those keys. Students and friends are not allowed to use any staff key, nor are they allowed to enter areas requiring supervision without the person in charge present. A supervising adult is responsible for checking all doors and windows in the used area before leaving the building.

Article 16

Sexual and Other Unlawful Harassment

Regina Caeli Academy is committed to providing a work environment that is free from all forms of harassment on the basis of any condition or characteristic protected by federal, state, or local law. In addition, Regina Caeli Academy prohibits sexual harassment.

Sexual harassment is defined as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. This definition includes many forms of offensive behavior and includes sex-based harassment of a person of the same sex as the harasser. The following is a partial list of sexual harassment examples:

1. Unwanted sexual advances;
2. Offering employment benefits in exchange for sexual favors;
3. Making or threatening reprisals after a negative response to sexual advances;
4. Visual conduct that includes leering, making sexual gestures, or displaying of sexually suggestive objects or pictures, cartoons, or posters;
5. Verbal conduct that includes making or using derogatory comments, epithets, slurs, or jokes;
6. Verbal sexual advances or propositions;
7. Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes, or invitations;

8. Physical conduct that includes touching, assaulting, or impeding or blocking movements.

These types of activities constitute sexual harassment when: (1) submission to such conduct is made whether explicitly or implicitly a term or condition of employment; (2) submission or rejection of such conduct or communication is used as a basis for making employment decisions; or, (3) the conduct or communication has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive work environment.

If you experience or witness sexual or other unlawful harassment in the workplace, report it immediately to your supervisor. If the supervisor is unavailable or you believe it would be inappropriate to contact that person, you should immediately contact the next person in line of authority to that supervisor.

All allegations of sexual harassment will be quickly and discreetly investigated. To the extent possible, your confidentiality and that of any witnesses and the alleged harasser will be protected. When the investigation is completed, you will be informed of the outcome of the investigation.

Anyone engaging in sexual or other unlawful harassment will be subject to disciplinary action, up to and including termination of employment.

Article 17

Smoking Policy

The Academy is to be an entirely smoke-free environment in all of its center buildings, grounds, and work sites during center and business hours. Exceptions to the policy during special events and off-hours will be observed only on center grounds. Exceptions do not extend to buildings and work sites.

Article 18

Substance Abuse Policy

The Academy recognizes a responsibility to help provide a safe and productive workplace for its employees. To this end and to safeguard the Academy's property, protect the health and safety of the general public, and to set a positive example for the community in which the Academy does business, the Academy has adopted a Substance Abuse Policy. Compliance with this policy is a condition of initial and continued employment with the Academy.

It is the policy of the Academy to maintain a drug-free workplace. The Academy prohibits the

manufacture, distribution, dispensation, possession, concealment, use, sale, or transfer of alcohol, inhalants, drugs, or controlled substances during center or work hours, or on center or work grounds. The Academy also prohibits the possession of drug-related paraphernalia or literature promoting the use of illegal drugs, as well as oral discussions promoting the use of illegal drugs while at center or work, or on center or work grounds.

The Academy also prohibits the presence of any person on center or work premises or grounds while under the influence of alcohol, inhalants, drugs, or controlled substances. "Under the influence" means a .08 or greater alcohol concentration in a sample taken; observable impairment in speech or activity as a result of alcohol consumption; or having a detectable level in the person's body of drugs, inhalants, or controlled substances, regardless of when or where it may have been consumed.

If approved by the administration, the moderate use of alcoholic beverages at center-sponsored events is not prohibited under this policy. However, even if use of alcohol is approved, no employee may be under the influence as defined above.

Compliance with this policy is a condition of initial and continued employment. Disciplinary action, up to and including termination, may be taken against any employee who violates the policy.

Prescription drugs prescribed by a licensed medical practitioner for the person using or possessing them and over-the-counter medications are generally not prohibited by this policy, provided they are legally obtained and are not consumed at a frequency or quantity greater than the dosage prescribed or otherwise recommended on the medication's label.

An employee taking a prescription or over-the-counter drug or medication that is known or advertised as possibly affecting or impairing judgment, coordination, or other senses, or which may adversely affect a person's ability to perform work in a safe and productive manner, must notify administration before start of employment or before taking such medication anytime during employment. The administrator in consultation with the Board of Trustees and appropriate medical personnel, will decide if the employee may be hired or remain at center or work, and, if so, if any work restrictions are necessary.

Article 19

Tools and Equipment

All tools and equipment belonging to the Academy are to be utilized exclusively for center business. Personal use of center tools and equipment is allowed only with the express consent of the administration or management of the Academy and with a full acceptance of liability. The

Academy will in no way be responsible for any injury or damage resulting from such use or any defects, malfunction, or lack of maintenance upon such tools and equipment.



My signature below indicates I have read and fully understand the Personnel Policy Handbook of Regina Caeli Academy. Further, I agree to abide by the procedures set forth therein throughout the term of my employment. I understand that these policies may change from time to time within the discretion of RCA.

I agree that RCA may implement fines for my failure to be present during work hours and I authorize RCA to deduct these fines from my paycheck.

I also agree that I shall exercise commercially reasonable precautions to protect the integrity and confidentiality of RCA materials and information. Upon termination of my employment, and in any case upon the Company's request, I shall return immediately to RCA all copies and other tangible manifestations of Confidential Information in my possession or control.

Employee signature

Employee Printed Name

Date

PLEASE NOTE:

This page is to be signed via electronically* within one week after receiving the Employee Policy Handbook to review. This acknowledgement becomes a permanent part of an employee personnel file.

***Electronic Signature is included in link sent to employee with the employee contract, terms of agreement and oath of fidelity.**